

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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|---------------------------|---|-------------------------------|
| UNITED STATES OF AMERICA, | : | |
| | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | Criminal Action No. 06-94-GMS |
| | : | |
| MELVIN MUNCE, | : | |
| | : | |
| Defendant. | : | |

JOINT MOTION FOR WAIVER OF SPEEDY TRIAL

The Defendant, Melvin Munce, by and through his counsel, Eleni Kousoulis, Esquire, and the United States of America, by and through its attorney, Robert Kravetz, Assistant United States Attorney, hereby jointly move for waiver of speedy trial in this matter. In support of this joint motion, the parties submit the following:

1. A scheduling conference in this matter was originally scheduled for December 27, 2007. On that date, the scheduling conference was continued. The scheduling conference is currently scheduled for January 22, 2007. The last day for trial under the Speedy Trial Act, 18 U.S.C. § 3161(c)(1), is January 22, 2007. The parties anticipate that this matter will be resolved by way of a guilty plea.

2. The parties assert that relief from the Speedy Trial Act is in the best interest of justice and jointly move to exclude from the speedy trial calculation the time between December 27, 2006, the original scheduling conference date, and January 22, 2007, the date set currently for the scheduling conference.

WHEREFORE, for these reasons and any other such reasons that shall appear to the Court, the parties respectfully request that the time period between December 27, 2006 and January 22, 2007 be excluded from the speedy trial calculation.

Respectfully Submitted,

/s/

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/s/

Robert Kravetz, Esq.
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Dated: January 11, 2007

IT IS SO ORDERED this _____ day of _____, 2007.

The Honorable Gregory M. Sleet
United States District Court